

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: C.R. BARD, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2187

IN RE: AMERICAN MEDICAL SYSTEMS, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2325

IN RE: BOSTON SCIENTIFIC, PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2326

IN RE: ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2327

IN RE: COOPLAST PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2387

IN RE: COOK MEDICAL, INC, PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL NO. 2440

IN RE NEOMEDIC PELVIC REPAIR SYSTEM
PRODUCT LIABILITY LITIGATION

MDL NO. 2511

THIS DOCUMENT RELATES TO ALL CASES

**KLINE & SPECTER, P.C.'S REPLY TO THE COMMON BENEFIT FEE AND
COST COMMITTEE'S RESPONSE IN OPPOSITION TO THE MOTION
FOR APPOINTMENT OF A SPECIAL MASTER**

Pursuant to the Federal Rules of Civil Procedure, Kline & Specter, P.C. ("Kline & Specter") hereby submits this Reply to the Common Benefit Fee and Cost Committee's ("FCC") Response in Opposition to the Motion for Appointment of a Special Master.¹

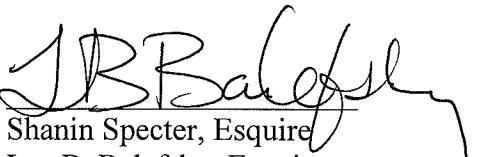
¹ Kline & Specter notes the FCC's angry and irrelevant attacks. This intemperance speaks to the merits of the FCC's position.

Judge Stack admits he probably should not have signed the preliminary fee recommendations and didn't feel comfortable doing so. He is right. This constitutes a recommendation of fees. Apparently, now, Judge Stack is preparing to make new and different recommendations. Obviously, someone else must independently find the facts of what are the appropriate fees to be paid to the lawyers who worked for the common benefit.

Dated: February 26, 2019

Respectfully submitted,

KLINER & SPECTER, PC


Shanin Specter, Esquire
Lee B. Balesky, Esquire
1525 Locust Street
Philadelphia, PA 19102
(215) 772-1000
Counsel for Plaintiffs

BOWLES RICE, LLP

By: /s/ Floyd E. Boone Jr.
Charles M. Love, III (WVSB 2254)
Floyd E. Boone Jr. (WVSB 8784)
600 Quarrier Street
Charleston, WV 25301
(304) 347-1100 (Tel.)
(304) 347-1746 (Fax)
fboone@bowlesrice.com
Counsel for Kline & Specter, P.C.